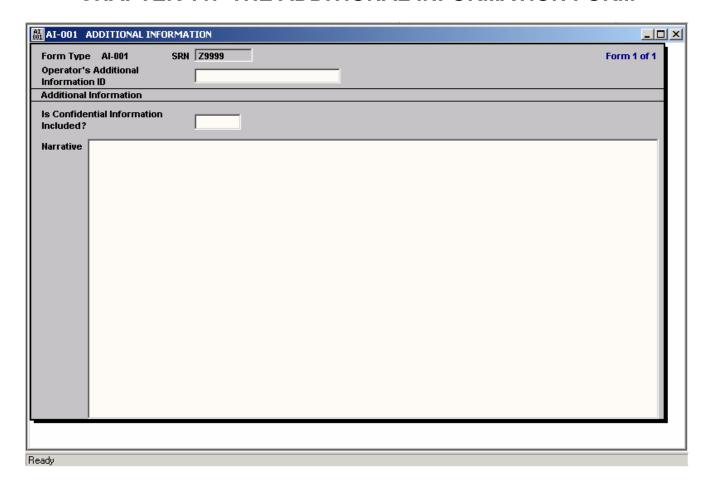# CHAPTER 11
The Additional Information Form: AI-001

In This Chapter:

- Form Overview

- Form Completion Instructions

- Adding an Additional Information Form

- Deleting an Additional Information Form

CHAPTER 11: THE ADDITIONAL INFORMATION FORM

FORM OVERVIEW

The Additional Information Form, AI-001, is used to submit information or attachments to supplement the specific information requested in the application including confidential information, compliance plans, progress reports, and process flow diagrams. A narrative description and any other information that the applicant feels is necessary to supplement the specific information requested may also be included. Additional information is not limited to text and may include calculations, design parameters, tables, small diagrams, etc. Attachments such as drawings, graphs, manufacturer's literature, demonstrations, protocols, computer diskettes, or CDs may also be necessary to supplement or clarify the information on a form. Any attachments specifically required for an individual form are identified on the form, or in the instructions for that form. Attachments must be labeled with the Additional Information ID. If the information or attachment is more than one page in length, label each page to show the relationship between pages.

There are two ways to access an AI-001 form. If you are completing a form in PASS-ROP and would like to supplement it with additional information you are able to create a new AI-001 form by clicking the "Display Additional Information Form" button (Figure 11-1). If you click this button and have not yet created any AI-001 forms, then a blank AI-001 form will be opened. The Operator's ID you enter on the AI-001 form will be automatically entered onto the form it is associated with.

Figure 11-1: Additional Information Buttons

You can also open the AI-001 form using the "AI-001" tool bar icon or by choosing **Forms** on the menu bar. Once you have completed and saved the AI-001 form, you must link it to the form it supplements. Open the form the AI-001 form should be linked to and select "Display Additional Information Form" (Figure 11-1). A box will appear that displays all the AI-001 forms in your ROP application that are not linked to a specific form, including the one you just created (Figure 11-2). Select the AI-001 form to be associated with the form currently open.
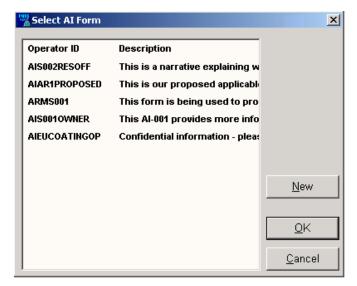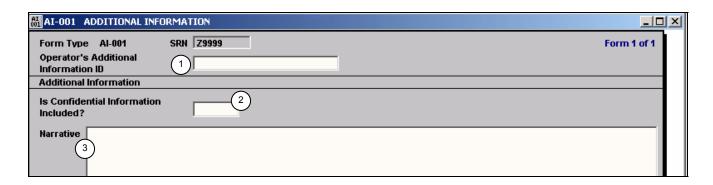

Figure 11-2: AI Form Selection Box

FORM COMPLETION INSTRUCTIONS

The top of the form displays the **Form Type** that is open (AI-001) as well as the facility's State Registration Number (SRN). This information is pre-filled and cannot be edited.

A record counter that identifies the form currently displayed appears in the upper-right corner. "Form 1 of 5" indicates that Additional Information Form 1 of 5 total records is currently displayed on the screen. As you move through the AI forms, the counter will keep track of the form displayed (e.g. Form 3 of 5). To move to a different form, use the arrow buttons on the tool bar or click on the browse button.

1. **Operator's Additional Information ID:** Enter a unique ID for this Additional Information Form. The Operator's Additional Information ID must begin with an "AI" prefix plus any combination of up to 14 letters, numbers, or keyboard characters. Spaces are not allowed within the operator's ID. You should create an ID that represents the form or field it is supplementing (e.g. AI-EUBOILERS, AI-S001, AI-AR-ML-PM-02).

2. **Is Confidential Information Included?:** Click on this field and a drop down list of your choices will appear. If "Yes" is selected, the text "**Confidential information - please see attached**" will appear next to the field. You will need to attach the confidential information to this AI-001 form after it is printed. If you wish to enter other information that is not confidential you may do so in the narrative field (see Step 3).

Confidential Information

Section 5516 (3) of Act 451 provides for information submitted in a permit application to be kept confidential, upon request by the applicant. The information that is to remain confidential must be a trade secret or secret process, or production, commercial, or financial information which would jeopardize the competitive position of the applicant upon disclosure. This type of information can be kept confidential and will not be available for review by the general public. However, if a request for public records is made under Section 5 of the Freedom of Information Act, Act No. 422 of the Public Acts of 1976, Section 15.235 of the Michigan Compiled Laws, the department shall notify the applicant of such request. The applicant has 25 days after receipt of notice to demonstrate that the confidential information should not be disclosed. Data on the quantity, composition, or quality of emissions from any stationary source cannot be kept confidential and shall be made available to the public.

- Use an AI-001 form to identify the data value and units. If any of these items are used in a requirement to limit a stationary source's potential to emit, they cannot be kept confidential.
- All confidential information must be submitted in a sealed envelope stamped CONFIDENTIAL and labeled with the SRN, Source/Section Name, and ROP Section Number. Any information submitted as confidential must also be submitted by the applicant directly to the USEPA at: United States Environmental Protection Agency, Region 5, 77 West Jackson Blvd., Chicago, IL 60604.

Refer to *Operational Memorandum No. 10 – Procedures for Handling of Confidential Materials and Freedom of Information Requests for Confidential Material* for details

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3. **Narrative:** Provide a description of the additional information or attachments in this field. If you want to add supplemental information on different topics, be sure to separate the different topics using spaces, numbers, or titles. You may refer to other documents in this field which have already been prepared (e.g., compliance plans, site diagrams, stack layouts, calculations). In addition, if the information you wish to include was already entered onto a different AI-001 form, you can simply refer to the other AI-001 form instead of re-entering it onto this form. Although you have unlimited space to write your narrative electronically, when you print this form it may be broken into several pages.

The following information may be included on or attached to an AI-001 form:

Process Flow Diagram: A process flow diagram may be used to supplement information about an emission unit included on an EU-003 form. A complete flow diagram shows the material flow into each piece of process equipment. Examples include fuel oil piping into a boiler or a conveyor feeding a rock crusher. Show the flow of air emissions from each piece of process equipment to each stack or vent. Show all air pollution control equipment, all fugitive emission sources, and all storage tanks, except those classified as insignificant activities. Additionally, identify the following applicable parameters on the process flow diagram.

- Temperature
- Pressure
- Flow Direction
- Flow Rate
- Material Composition
- Equipment

Compliance Plan (noncompliance): A Compliance Plan is required for all applicable requirements that are identified on the Applicable Requirement form (AR-001 or AR-002) where "No" is selected for items 13, 14, or 15. Provide the following information:

- The requirement ID from AR-001 or AR-002 for the applicable requirement for which the stationary source is in non-compliance.
- The ID of the device, emission unit/process group, stack, monitoring system, or other group that is not operating in compliance with the Applicable Requirement ID identified and for which the compliance plan was developed. The Operator's ID must be the same as the Operator's ID provided on the applicable requirement form or must represent a subset of the devices included in the Operator's ID provided on the applicable requirement form (i.e., a requirement applies to an Operator's ID flexible group that includes 20 stacks. One of the stacks is out of compliance with the requirement. The Operator's ID for the compliance plan would be the Stack ID not the Flexible Group ID).
- A narrative describing the applicable requirement for which the stationary source is in noncompliance and details describing how compliance will be achieved.
- A schedule of compliance. This is an enforceable sequence of remedial measures, with milestones, prepared to achieve compliance with an applicable requirement.

Progress Reports: Submit a progress report using AI-001 in accordance with the progress report schedule set forth in every compliance plan. Submit progress reports during the application process pursuant to R 336.1213(4)(b) and after permit issuance. Include the following information in a progress report:

- The ID created on an AI-001 form for the compliance plan to which this progress report refers.
- The first date by which a progress report for this compliance plan will be submitted.
- The reporting frequency. This is the interval (monthly, quarterly, or semi-annual) between progress report submittals.
- The date or dates for achieving the activities, milestones, or compliance required in the schedule of compliance.
- The date or dates when the activities, milestones, or compliance were achieved.
- Indicate if the stationary source is in compliance with the applicable requirement addressed by this compliance plan and progress report.
- An explanation of why any dates in the schedule of compliance was not or will not be met.
- A description of any preventive or corrective measures adopted.

ADDING AN ADDITIONAL INFORMATION FORM

To add another Additional Information Form to your ROP application:

1. Choose **Edit** on the menu bar and select **Add Additional Information Form**.
2. A new AI-001 form will be generated to complete.

DELETING AN ADDITIONAL INFORMATION FORM

If you would like to delete an Additional Information Form:

1. Select the record that you would like to delete.
2. Choose **Edit** on the menu bar and select **Delete Additional Information Form**.
3. The Additional Information Form will be deleted

- REMEMBER TO SAVE YOUR CHANGES! -

NEED HELP? **For assistance with completing the AI-001 form, contact your AQD district office (see Appendix D) or the Clean Air Assistance Program at: (800) 662-9278.**